

**STATE OF CALIFORNIA
ENERGY RESOURCES CONSERVATION
AND DEVELOPMENT COMMISSION**

In the Matter of:

The Preparation of the *2005 Integrated Energy Policy Report (2005 Energy Report)*

Docket 04-IEP-1D

**COMMENTS OF APS ENERGY SERVICES, CONSTELLATION NEWENERGY,
SEMPRA ENERGY SOLUTIONS AND STRATEGIC ENERGY**

In accordance with the *Notice Regarding August 24, 2005 Hearing on Appeals Filed by SCE, PG&E, and SDG&E of the Energy Commission Executive Director's Notice of Intent to Release Aggregated Data, dated June 3, 2005*, APS Energy Services, Constellation NewEnergy, Sempra Energy Solutions, and Strategic Energy (collectively, "ESP Parties") hereby submit these comments.

The ESP Parties are submitting these comments to convey their support for Staff's proposal for aggregation of confidential load forecast and resource plan data that energy service providers (ESPs) and other load serving entities (LSEs) have provided to facilitate preparation of the Commission's *2005 Integrated Energy Policy Report*.¹


The aggregation issue is a product of Staff's responsibility to preserve the confidentiality of LSE-specific data while at the same time providing the Commission with adequate information about the state's resource outlook to make informed findings and conclusions in the *Energy Report* and, as the starting point for the new integrated statewide resource planning process, to provide the Commission's sister agency, the California Public Utilities Commission, with an informed assessment of the likely range of statewide and LSE-specific resource needs.

¹ The ESP Parties support the staff's proposal as it relates to data submitted by both ESPs and investor owned utilities (IOUs). The ESP Parties take no position as to the portions of the staff's proposal that relate solely to IOU data.

For purposes of IEPR workshops and reports, Staff proposes to aggregate confidential load forecast and resource plan data geographically at the control area level, with data for the California Independent System Operator control area aggregated at the transmission planning control area level. Stated in less technical terms, Staff proposes to aggregate confidential LSE data at the “planning area” level. For example, under Staff’s proposal, data for all LSEs that serve and/or forecast load in the service territory of Southern California Edison Company (SCE), including SCE, ESPs and Community Choice Aggregators, will be aggregated.

Staff’s aggregation proposal strikes a reasonable balance between the need for an open and informed IEPR process and the need to protect LSEs and their customers from the potential harms resulting from the release of the confidential, LSE-specific information in Staff’s possession. Accordingly, the ESP Parties urge the Commission to approve Staff’s proposal.

Respectfully submitted,



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